

PATENT

ocket No. 1232-4367US1

50. (New) The apparatus according to claim 11, wherein the identifier is expressed as part of a path name in the URL.

51. (New) The apparatus according to claim 50, wherein the identifier is expressed as part of a resource name in the path name in the URL.

52. (New) The apparatus according to claim 11, wherein the control information is stored separately from the address.

REMARKS

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I. Status of the Claims

Claims 1-34 and 41-46 are currently pending in this application.

By this Amendment, claims 47-52 have been newly added. No new matter has been introduced by this Amendment. Entry and consideration of this Amendment are respectfully requested. Upon entry of this Amendment, claims 1-34 and 41-52 would be pending.

Entry of this amendment before examination on the merits is respectfully requested. No new matter has been introduced by this amendment. In the event that a telephone conference would facilitate examination in any way, the Examiner is invited to contact the undersigned representative at the number provided.

PATENT**Bucket No. 1232-4367US1****REJECTION OF THE CLAIMS**

Claims 1-23 were rejected under 35 U.S.C. §103(a) as being unpatentable over WebCAM+ and further in view of "Developing CGI Application With Perl" (hereinafter "Perl"). Claims 23-34 and 41-46 were rejected under 35 U.S.C. §103(a) as being unpatentable over WebCAM+, Perl, and further in view of the Mercury Project "Beyond the Web: Excavating the Real World Via Mosaic" (hereinafter "Mercury"). Applicants respectfully traverse these rejections for the reasons set forth below.

CLAIMS 1 AND 11:

Independent claims 1 and 11 as amended, is directed to an arrangement involving storing of a network address of an object site in memory and control information for a respective image input device of the object site in relation to the network address, and accessing a designated site using the address read from the memory. The control information includes an identifier for identifying an item to be controlled by the image input device.

In reviewing the Perl reference and the PTO-892 Form (from the Office Action of March 31, 1999), there is no indication on the record of the publication date of the Perl reference or the date upon which the Examiner is relying upon. As such, Applicants respectfully request the Examiner to provide additional information as to the publication date of this reference.

Otherwise, Applicants respectfully submit that the reference does not qualify as prior art and may not be relied upon to reject the claims. Furthermore, in the event that the reference does not qualify as prior art, Applicants respectfully submit that

the reference may not be relied upon by the Examiner because it does not appear to satisfy any of the exceptions noted in MPEP §2124. For example, the Perl reference is not cited to show a universal fact, such as the characteristics or properties of a material or a scientific truism.

Furthermore, the Examiner asserts that the feature of control information including identification related to the item to be controlled is well known in the art. See Office Action dated June 15, 2001, page 2. Applicants traverse the Examiner's Official Notice taking and respectfully requests the Examiner to provide objective support (e.g., a reference) for his assertions in the relevant arts, particularly in the event Perl is not deemed to be a suitable reference.

In addition, as previously noted, Applicants respectfully submit that the cited references, individually or in combination, do not disclose or suggest the control information including an identifier for identifying an item to be controlled by the image input device. As acknowledged by the Examiner, the WebCAM+ reference is silent as to control information including such an identifier. The remaining Perl reference simply shows name value pairs and is silent as to such name value pairs identifying an item to be controlled by the image input device.

CLAIMS 23 AND 31:

Independent claims 23 and 31 are directed to an arrangement involving transferring the processing results with information indicative of a service allowable range of the camera based on a received request.

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As acknowledged by the Examiner, the WebCAM+ and Perl references are silent as to the above-noted limitation. The Examiner appears to rely on the "Beyond the Web" reference as generally teaching operating range and status of a device (e.g., robot) on a web page interface. However, the Mercury reference (particularly on page 3) generally shows a crude navigation interface which appears to identify a current position of the robot arm schematically and in X, Y, Z coordinates. However, none of the cited references appears to disclose or suggest transferring the processing results with information indicative of a service allowable range of the camera or transferring such data based on a received request. Further, the Examiner has not addressed the above-noted limitations with sufficient particularity in the Office Action. Accordingly, Applicants respectfully request the Examiner to address the specific claim language with greater specificity in regard to the cited references.

As best understood, as to some of the dependent claims, the Examiner appears to acknowledge that the references do not specifically teach those limitations, but asserts that "the particular place where the result is inserted into the HTML document and the type of allowable service range of the server/device would have been a matter of design choice." (emphasis added)

Applicants respectfully disagree with the Examiner's design choice assertions. Obvious matter of "design choice" rejections are proper only where an Applicant fails to state *any reason* for the claimed feature, and the claimed arrangement would not perform differently than the prior art. In re Chu, 66 F.3d 292, 298-99 (Fed. Cir. 1995)(reversing design choice rejection because of advantages accruing to use of claimed feature). As to the "type of allowable service range", this information provides,

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for example, the user with beneficial information as to the specific capabilities of the device, e.g., to facilitate remote user operation. As to the insertion of the information in the HTTP message (e.g., in the header or body), they provide, for example, efficient approaches to transmitting both the processing results with the information indicative of the service operable range. Furthermore, the claimed arrangements clearly perform differently than the prior art. Thus, the claimed arrangements are not simply a mere matter of design choice.

Further as to the remaining dependent claims, the Examiner appears to have taken Official Notice on Page 6 of the Office Action dated June 15, 2001. In particular, the Examiner states "[i]t is well known in the art to provide feedback, error notification, and operation limitations, etc. of a device to a user." Applicants traverse the Examiner's Official Notice taking and respectfully requests the Examiner to provide objective support (e.g., a reference) for his assertions in the relevant arts.

CLAIMS 32, 33 AND 34:

Claims 32, 33 and 34 are directed to an arrangement involving comparing information indicative of the operable limitation of the camera transferred from the server with the request information and notifying the result of the comparison.

On the contrary, the cited references appear to be silent as to any comparison operation being performed or, more specifically, a comparison operation of the operable limitation of the camera versus the request. It necessarily follows that the cited references also do not disclose or suggest any notification of the results of the

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comparison. Further, the cited references appear to be silent as to such operations being performed at the client-side.

Furthermore, the Examiner asserts that "[i]t is well known in the art to check control parameters to make sure they are within operable range and return notification when there is an error." See Office Action of June 15, 2001, Page 2. Applicant traverse what appears to be a taking of Official Notice, and respectfully requests the Examiner to provide objective support (e.g., a reference) for his assertions in the relevant arts.

The Examiner also has not addressed some of the above-noted limitations with sufficient particularity in the Office Action. As noted above, the Examiner generally asserts that checking control parameters and notification are well known in the art. The Examiner's assertions are believed to be overly broad and still do not address the various limitations, such as the claimed operations being performed on the client-side or the specific parameters (e.g., operable limitations of the camera) being compared with a request. Applicants respectfully request the Examiner to address each and every limitation in the claim language with greater specificity.

NEW DEPENDENT CLAIMS

New claims 47-52 each recite one of the following: (1) the identifier is expressed as part of a path name in the URL, (2) the identifier is expressed as part of a resource name in the path name in the URL, or (3) the control information is stored separately from the address.

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Applicants respectfully submit that none of the cited references, individually or in combination, disclose or suggest any of the above-noted limitations.

CONCLUSION

Based on the foregoing amendments and remarks, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 1-34 and 41-46 and allowance of this application.

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Jcket NO. 1232-4367US1**AUTHORIZATION**

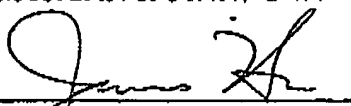
The Commissioner is hereby authorized to charge any additional fees which may be required for consideration of this Amendment to Deposit Account No. 13-4503, Order No. 1232-4367US1. A DUPLICATE OF THIS DOCUMENT IS ATTACHED.

In the event that an extension of time is required, or which may be required in addition to that requested in a petition for an extension of time, the Commissioner is requested to grant a petition for that extension of time which is required to make this response timely and is hereby authorized to charge any fee for such an extension of time or credit any overpayment for an extension of time to Deposit Account No. 13-4503, Order No. 1232-4367US1. A DUPLICATE OF THIS DOCUMENT IS ATTACHED.

Respectfully submitted,
MORGAN & FINNEGAN

Dated: August 8, 2002

By:


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